

WORKING SOLUTIONS

April 22, 2024

VIA ECF

Honorable Philip M. Halpern, United States District Judge
United States District Court, Southern District of New York
Hon. Charles L. Brieant Jr. Federal Building and Courthouse
300 Quarropas Street, Courtroom 520
White Plains, New York 10601

Application granted in part. The deadline to file any motion(s) *in limine* and/or pretrial memoranda is extended to August 15, 2024.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 22, 2024

Re: *Bucciero et al., v. Amrock, LLC*, Case No. 7:23-cv-4953 (S.D.N.Y.)

Dear Judge Halpern:

Our firm represents the Plaintiffs in the above referenced matter. We write jointly with Defendant's counsel to inform the Court of the parties' intent to mediate this case. The parties have agreed upon a mediator with substantial experience mediating complex wage and hour matters and have booked a mediation with him for July 25th, 2024, was the mediator's next available mediation date.

The parties recognize Your Honor's desire to move this case forward without further delay and are prepared to submit their joint Pre-trial Order, joint voir dire, and joint jury instructions, pursuant to Your Honor's Individual Practice Rule 6(A) and 6(B)(i), by the Court's May 10, 2024, deadline. *See* Dkt. No. 73 (ordering parties to submit Rule 6(A) and 6(B) pre-trial materials by May 10, 2024). The parties, however, respectfully request an extension of time to submit any motions *in limine* or pretrial memorandum, pursuant to Your Honor's Individual Practice Rule 6(B)(iii) and (iv), until two weeks after the mediation, if unsuccessful. The parties further request that the case not be placed on the Court's trial calendar until after the motions *in limine* and pretrial memorandum are filed.

This is the parties first request for an extension of this deadline. We thank the Court for its time and consideration. If the Court has any questions, please do not hesitate to contact the undersigned.

Respectfully,

/s/ Rachel M. Haskell
Rachel M. Haskell, Esq.

cc: All Counsel (via ECF)